Ms. Monica Hammer
Avery Dennison
870 W. Anderson Blvd.
Greenfield, Indiana 46140

Re: 059-12392
Significant Source Modification to:
Part 70 permit No.: T059-7475-00018

Dear Ms. Hammer:

Avery Dennison was issued Part 70 operating permit T059-7475-00018 on July 12, 1999 for a pressure sensitive paper coating operation. An application to modify the source was received on June 16, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:

(1) Two (2) flow coating operations and one (1) roll coating operation;

(2) Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and

(3) One (1) natural gas fired boiler with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.

The modification also consists of the following insignificant activities:

(a) Eight (8) 13,000-gallon water-based emulsion adhesive tanks.

(b) One (1) 8,000-gallon waste water tank.

(c) One (1) 80KW capacity corona treater.

(d) One (1) 400-ton capacity cooling tower.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the

rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(l), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

ERG/MP

cc: File - Hancock County
U.S. EPA, Region V
Hancock County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Avery Dennison
870 West Anderson Boulevard
Greenfield, Indiana 46140

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: 059-7475-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 12, 1999

First Administrative Amendment 059-12396, issued on July 18, 2000.

First Significant Source Modification: 059-12392	Pages Affected: 2, 3, 3a, 4, 4a, 18-24a, 27a-27e, 32a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary pressure sensitive paper coating and laminating operation.

Responsible Official:	John L. Collins
Source Address:	870 West Anderson Blvd., Greenfield, Indiana 46140
Mailing Address:	870 West Anderson Blvd., Greenfield, Indiana 46140
Phone Number:	317-462-1988
SIC Code:	2672
County Location:	Hancock
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, with maximum capacity of nine hundred ninety-three (993) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:

(A) One (1) flow coating operation and one (1) roll coating operation; and

(B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr).

(2) Two (2) natural gas fired boilers, constructed in October, 1994, identified as B-01 and B-02, with maximum heat input capacity of 10.205 million British thermal units per hour (mmBtu/hr) each, exhausting to two (2) stacks (B-01 and B-02).

(3) One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:

(A) Two (2) flow coating operations and one (1) roll coating operation;

(B) Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and

(4) One (1) natural gas fired boiler with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each;

(2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons;

(3) Eight (8) 13,000-gallon water-based emulsion adhesive tanks; and

(4) One (1) 8,000-gallon waste water tank.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

C.8 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total VOC emissions from the entire source shall be less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Compliance with this limit shall be demonstrated using the quarterly report located at the end of this permit.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 10, 1996 with the Part 70 Permit application.

(b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C -Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management

Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;
(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other

means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(Advanced Source Modification)

(1) One (1) pressure sensitive paper coating operation, constructed in October, 1994, identified as BE-1, with maximum capacity of nine hundred ninety-three (993) billion square inches per year, exhausting to two (2) stacks (C-1 and D-1), consisting of the following equipment:
  (A) One (1) flow coating operation and one (1) roll coating operation; and
  (B) Two (2) natural gas fired drying ovens, with total maximum heat input capacity of 48.7 million British thermal units per hour (mmBtu/hr.

Insignificant Activities

(IA1) Five (5) water-based emulsion adhesive storage tanks with maximum storage capacity of 16,400 gallons each; and

(IA2) One (1) emulsion wastewater storage tank with maximum storage capacity of 7,000 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for each calendar month.

SECTION D.3 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:

Two (2) flow coating operations and one (1) roll coating operation;
Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and

This facility also consists of the following insignificant activities:

Eight (8) 13,000-gallon water-based emulsion adhesive tanks;
One (1) 8,000-gallon waste water tank
One (1) 80KW capacity corona treater
One (1) 400-ton capacity cooling tower

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of pressure sensitive paper may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds VOC per gallon of coating excluding water, delivered to the coating applicator.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442, Subpart RR, when the pressure sensitive paper coating operation input Volatile Organic Compound (VOC) usage exceeds 45 megagrams per 12 consecutive month period (equivalent to 49.6 tons per 12 consecutive month period), the pressure sensitive paper coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids (0.20 lb VOC per lb of coating solids) applied as calculated on a weighted average basis for each calendar month.

D.3.3 New source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, no more than 0.20 kg HAP may be emitted per kg coating solids applied, as calculated on a weighted average basis for all coatings used each calendar month.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, is accordance with Section B - Preventive Maintenance Plan, of this permit, is required for GF2 and any control devices.

Compliance Determination Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 12]

Whenever, the input VOC usage exceeds forty-five (45) megagrams per 12 consecutive month period, the Permittee shall perform VOC testing using the method established in the test protocol. IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1, D.3.2, and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b]

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1), (2), (4), and (5) shall be taken monthly. Records maintained for (3) shall be taken daily as needed. All records maintained shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.3.1, D.3.2, and D.3.3.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of usage each month and logs of the dates of use when using noncompliant coatings;

(3) The volume weighted VOC content of the coatings used for each day that any coating with VOC greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content grater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by use of the following equation to calculate daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\Sigma \text{ coatings } [Dc * O\,Q / [1 - W * Dc / Dw]]}{\Sigma C}$$

Dc	=	density of coating, lb/gal	Dw	=	density of water, lb gal
O	=	weight percent organics, %	Q	=	quantity of coating, gal/unit
W	=	percent volume water, %	C	=	total of coatings used, gal/unit;

(4) The total VOC and HAP usage for each month; and

(5) The weight of VOCs and HAP emitted for each compliance period.

(b) The Permittee shall keep records readily accessible of the dimension of the eight (8) waterbased emulsion adhesive storage vessels and an analysis showing the capacity of each storage vessel for the life of the source.

(c) Pursuant to 40 CFR 60.445, the Permittee shall maintain the following records:

(1) A calendar month record of all coatings used and the results of the manufacturer's formulation data.

(2) A calendar month record of the amount of solvent applied in the coating facility.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1, D.3.2, and D.3.3, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) natural gas fired boiler, identified as B-03, with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 6-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the one (1) 10.205 million British thermal units per hour natural gas fired boiler identified as B-03 shall be limited to 0.4478 pounds per million British thermal unit. This limitation was based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBTU/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance Determination Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the particulate matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [326 IAC 12] [40 CFR 60.40(c)]

D.4.4 Record Keeping Requirements

(a) Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain monthly records of the amounts of fuel combusted for a period of two years following the date of such record for the one (1) 10.205 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, identified as B-03.

D.4.5 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the one (1) 10.205 million British thermal unit per hour (mmBtu/hr) natural gas fired boiler.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Avery Dennison
Source Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Mailing Address: 870 West Anderson Blvd., Greenfield, Indiana 46140
Part 70 Permit No.: T059-7475-00018
Facility: Source-Wide
Parameter: VOC [326 IAC 2-2]
Limit: Less than two hundred and fifty (250) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Emissions This Month (tons)	VOC Emissions Previous 11 Months (tons)	VOC Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.*

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Avery Dennison
Source Location:	870 West Anderson Blvd, Greenfield, Indiana 46140
County:	Hancock
SIC Code:	2672
Operation Permit No.:	T 059-7475-00018
Source Modification:	SSM 059-12392-00018
Permit Reviewer:	ERG/MP

On September 9, 2000, the Office of Air Management (OAM) had a notice published in the Daily Reporter, Greenfield, Indiana, stating that Avery Dennison had applied for a significant source modification to their Part 70 Operating Permit to operate an additional pressure sensitive coating operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 9, 2000, Avery Dennison submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

Condition D.3.4, Preventive Maintenance Plan. The existing coating operation is not required to have a PMP and therefore, we would like this condition revised to state that “a PMP is required for GF2" rather than “a PMP is required for this facility”.

Response to Comment 1:

The permit has been changed as follows:

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, is accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility~~ **GF2** and any control devices.

Comment 2:

Technical Support Document - Stack Summary, Page 2 of 7. The stack descriptions are incorrect and should be revised as follows:

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
E-1	Dryer	75	6.67	90,356	300
F-1	Dryer	75	5.75	70,619	270
G-1	Dryer	60	1.67	3,770	Ambient
B-03	Boiler	50	1	NA	Ambient

Response to Comment 2:

While the TSD does not get revised, this TSD addendum documents the correct stack parameters as indicated in the table above.

OAM staff has decided to make the following changes:

1. Condition D.3.8 has been changed as follows:

(b) The Permittee shall keep records readily accessible of the dimension of the eight (8) waterbased emulsion adhesive ~~and emulsion wastewater~~ storage vessels and an analysis showing the capacity of each storage vessel for the life of the source.

2. The header before Condition D.4.4 has been changed as follows:

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [326 IAC 12] [40 CFR 60.40c]

Ozone emissions from the corona treater should be considered with respect to PSD limits. Potential ozone emissions from the corona treater are as follows:

Ozone emissions = (0.0138 lb ozone/KW-hr) x (80 KW) x (8,760 hrs/yr) x (ton/2,000 lbs)
= 4.8 tons per year

Since the existing source is not major, the PSD rules do not apply.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Source Modification

Source Background and Description

Source Name:	**Avery Dennison**
Source Location:	**870 West Anderson Blvd, Greenfield, Indiana 46140**
County:	**Hancock**
SIC Code:	**2672**
Operation Permit No.:	**T 059-7475-00018**
Operation Permit Issuance Date:	**July 12, 1999**
Significant Source Modification No.:	**059-12392-00018**
Permit Reviewer:	**ERG/MP**

The Office of Air Management (OAM) has reviewed a modification application from Avery Dennison relating to the construction of the following emission units and pollution control devices:

(a) One (1) pressure sensitive paper coating operation, identified as GF2, with a maximum capacity of 1,500 billion square inches, exhausting to three (3) stacks (E-1, F-1, and G-1) consisting of the following equipment:

(1) Two (2) flow coating operations and one (1) roll coating operation;

(2) Two (2) natural gas fired drying ovens with a total maximum heat input capacity of 67.86 million British thermal units per hour (mmBtu/hr); and

(3) One (1) natural gas fired boiler with capacity of 10.205 million British thermal units per hour (mmBtu/hr) exhausting to stack B-03.

The modification also consists of the following insignificant activities:

(a) Eight (8) 13,000-gallon water-based emulsion adhesive tanks.

(b) One (1) 8,000-gallon waste water tank.

(c) One (1) 80KW capacity corona treater.

(d) One (1) 400-ton capacity cooling tower.

History

On June 16, 2000, Avery Dennison submitted an application to the OAM requesting to add an additional pressure sensitive paper coating operation to their existing plant. Avery Dennison was issued a Part 70 permit on July 12, 1999.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
E-1	Dryer	40	6.67	90,356	300
F-1	Dryer	40	5.75	70,619	270
G-1	Dryer	25	1.67	3,770	Ambient
B-03	Boiler	15	1.67	NA	Ambient

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 16, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.6
PM-10	2.6
SO_2	0.2
VOC	288
CO	28.73
NO_x	34.19

HAP's	Potential To Emit (tons/year)
Formaldehyde	3.14
Hexane	0.13
Vinyl Acetate	212
Methanol	1.98
TOTAL	217.5

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f) as the modification has a potential to emit greater than twenty-five (25) tons per year of VOC.

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Hancock County has been classified as attainment or unclassifiable for PM-10, SO_2, NO_2, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	1.1
PM-10	1.1
SO_2	0.2
VOC	219.7
CO	7.5
NOx	52.7

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the TSD for Operating Permit No. T 059-7475-00018 and the TSD for Construction Permit No. CP 059-3176-00018.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC*	CO	NO_X	HAPs
Paper Coating				249			217
Dryer Ovens	2.26	2.26	0.18	249	24.97	29.72	0.08
Natural Gas Boiler	0.34	0.34	0.03	249	3.76	4.47	0.08

* The 249 ton VOC/yr limit is a source wide limit and covers the proposed modification and the existing facilities. This limit will be reflected in Section C of the permit revision.

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) The pressure sensitive tape coating operation is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.440, Subpart RR). Pursuant to this subpart:

(1) The paper/pressure sensitive tape and label coating operation shall not discharge into the atmosphere in excess of 0.20 kg VOC per kg of coating solids applied, as calculated on a weighted average basis for each calendar month for all coating used.

(2) Whenever the input VOC usage exceeds forty-five (45) megagrams per 12 consecutive month period, the Permittee shall perform VOC testing using the method established in the text protocol.

(b) The eight (8) waterbased emulsion adhesive and one (1) emulsion wastewater storage tanks are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb) because their storage capacities are greater than forty (40) cubic meters, but less than seventy-five (75) cubic meters. Pursuant to 40 CFR 60.116b (a) and (b):

(1) The Permit shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessels for the life of the source.

(c) The one (1) 10.205 million British thermal units per hour (mmBtu/hr) natural gas fired boilers is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because its heat input capacity is greater than ten (10) million British thermal units per hour (mmBtu/hr) but less than one hundred (100) million British thermal units per hour. The requirements for natural gas boilers consist of monthly fuel usage recordkeeping and reporting.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (Maximum Achievable Control Technology)

Potential emissions from the proposed modification exceed 10 tons per year of a single HAP, therefore 326 IAC 2-4.1-1 applies. The MACT standard for the Paper and Other Web Coating source category has not yet been promulgated by EPA. However, a presumptive MACT standard for new sources has been published (Presumptive Maximum Achievable Control Technology for the Paper and Other Web Coating Source Category, EPA, 1997) and will be used as MACT for this facility.

Therefore, pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new pressure sensitive tape coating operation shall be the following:

(1) At least 95-99% overall control efficiency using an add-on control device; or

(2) No more than 0.20 kg HAP applied per kg coating solids applied, as calculated on a weighted average basis for each calendar month for all coating used; or

(3) No more than 0.20 kg HAP emitted per kg coating solids applied, as calculated on a weighted average basis for all coatings used each calendar month.

The Permittee indicated they will use compliant coatings to satisfy this requirement.

326 IAC 8-2-5 (Paper Coating Operations)

The one (1) flow coating operation is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because it will be constructed after the January 1, 1980 applicability date, has 100% substrate saturation, and its potential VOC emissions are greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the VOC content of the coatings applied to labels of any substrate, pressure sensitive tapes, paper, plastic or metal foil by means of web coating shall be limited to 2.9 pounds VOC per gallon of coating delivered to the applicator less water.

Based on the MSDS submitted by the source and calculations made, the one (1) pressure-sensitive tape coating operation is in compliance with this requirement. The calculations have not been attached to this document in Appendix A because Avery Dennison requested that the coating information be considered confidential.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The eight (8) waterbased emulsion adhesive and emulsion wastewater storage tanks are not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in any of the listed counties of this rule.

326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)), the one (1) 10.205 million British thermal units per hour natural gas fired boiler shall be limited to 0.45 pounds per million British thermal unit. This limitation was based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

(a) For the boilers:
Q = 30.615 mmBtu/hr (3 boilers total including two existing units)
Pt = 0.4478 lb/mmBtu

The boilers are in compliance when using natural gas by the following emission factor:

7.6 lb/MMCF, to convert this to lb/mmBtu = 7.6 lb/MMCF * MMCF/1,000 mmBtu = 0.0076 lb/mmBtu

0.0076 lb/mmBtu < 0.4478 lb/mmBtu, therefore the boilers are in compliance.

326 IAC 1-6-3 (Preventive Maintenance Plan)

(a) The Permittee shall prepare and maintain Preventative Maintenance Plans (PMP) upon startup, including the following information on each:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventative Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will

arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 059-12392-00018.

Appendix A: Emissions Calculations
VOC
From Adhesive Coating Operations

Company Name: Avery Dennison
Address City IN Zip: Greenfield, Indiana
CP: 059-12392
Plt ID: 00018
Reviewer: ERG/MOP
Date: 8/8/00

Material	Weight % Organics	Lbs of Mat. (lbs/unit)	Maximum (unit/year)	Potential VOC tons per year
AT-20	0.50%	71.00	1,494,806	265.33
Wacker 4-part	0.0344%	25.50	1,494,806	6.56
Silicone	1.0%	2.84	1,494,806	21.23

State Potential Emissions **286.55**

Note: Only 2 of the 3 booths can operate at the same time.

METHODOLOGY

Potential VOC Tons per Year = (Weight % Organics/100) * lbs of Material (lbs/unit) * Maximum (units/hr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
HAPs
From Adhesive Coating Operations

Company Name: Avery Dennison
Address City IN Zip: Greenfield, Indiana
CP: 059-12392
Plt ID: 00018
Reviewer: ERG/MOP
Date: 8/8/00

Material	Lbs of Mat. (lbs/unit)	Maximum (unit/year)	Weight % Vinyl Acetate	Weight % Formaldehyde	Weight % Methanol	Vinyl Acetate (tons/year)	Formaldehyde (tons/year)	Methanol (tons/year)	Total HAPs (tons/year)
AT-20	71.00	1,494,806	0.40%			212.26			212.26
Wacker 4-part	25.50	1,494,806		0.0163%	0.0104%		3.11	1.98	5.09
Silicone (no HAPs)	2.84	1,494,806							0.00

State Potential Emissions **217.35**

METHODOLOGY

Potential HAP Tons per Year = (Weight % HAP/100) * lbs of Material (lbs/unit) * Maximum (units/hr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **Avery Dennison**
Address City IN Zip: **Greenfield, Indiana**
CP: **059-12392**
Plt ID: **00018**
Reviewer: ERG/MOP
Date: 8/8/00

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.2	89.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.34	0.34	0.03	4.47	0.25	3.76

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Avery Dennison**
Address City IN Zip: **Greenfield, Indiana**
CP: **059-12392**
Plt ID: **00018**
Reviewer: ERG/MOP
Date: 8/8/00

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.391E-05	5.366E-05	3.354E-03	8.050E-02	1.520E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.236E-05	4.919E-05	6.261E-05	1.699E-05	9.391E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas-fired Ovens

Company Name: **Avery Dennison**
Address City IN Zip: **Greenfield, Indiana**
CP: **059-12392**
Plt ID: **00018**
Reviewer: ERG/MOP
Date: 8/8/00

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
67.9	594.5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	2.26	2.26	0.18	29.72	1.63	24.97

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas-fired Ovens
HAPs Emissions

Company Name: **Avery Dennison**
Address City IN Zip: **Greenfield, Indiana**
CP: **059-12392**
Plt ID: **00018**
Reviewer: ERG/MOP
Date: 8/8/00

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.242E-04	3.567E-04	2.229E-02	5.350E-01	1.011E-03

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.486E-04	3.269E-04	4.161E-04	1.129E-04	6.242E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.